

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

STACY S., et al.,)	
)	Civil Action No. 04-150E
Plaintiff,)	Jury Trial Demanded
)	
v.)	
)	ELECTRONICALLY FILED
GIRARD SCHOOL DISTRICT,)	
)	
Defendants.)	

**JOINT MOTION TO ENLARGE TIME TO SUBMIT
PRETRIAL STATEMENT AND DISPOSITIVE MOTIONS**

_____This is the Motion of the parties.

1. The parties have approached the Court to conduct a settlement conference.

2. Currently, dispositive motions and pretrial statement are due December 31, 2005.

3. Parties would request that the time for filing dispositive motions and pretrial statement be delayed until these settlement discussions can be completed, so as to avoid additional costs and expenses.

WHEREFORE, the parties request this Court postpone the due date of the pretrial statement and dispositive motion and schedule a settlement conference.

Respectfully submitted,

/s/Edward A. Olds
Edward A. Olds, Esquire
Pa. I.D. No. 23601
Carolyn Spicer Russ, Esquire
Pa. I.D. No. 36232
Richard Matesic, Esquire
Pa. I.D. No. 72211
Attorneys for Plaintiffs

1007 Mt. Royal Boulevard
Pittsburgh, PA 15223
(412) 492-8975

/s/Richard Lanzillo
Richard Lanzillo, Esquire
Pa. I.D. No. 53811
*Attorney for Defendants Girard
School District and Robert
Snyder*
KNOX McLAUGHLIN GORNALL &
SENNETT, P.C.
120 West Tenth Street
Erie, PA 16501
(814) 459-2800

CERTIFICATE OF SERVICE

I hereby certify that on December 27, 2005, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Richard A. Lanzillo, Esquire
KNOX McLAUGHLIN GORNALL & SENNETT, P.C.
120 West Tenth Street
Erie, PA 16501

and I hereby certify that I have mailed by United States Postal Service the document to the following non CM/ECF participant:

Edward J. Betza, Esquire
150 East Eighth Street
Erie, PA 16501

s/Edward A. Olds, Esquire
